

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GEORGE BOYD, et al.
*individually and on behalf of all
others similarly situated,*

Plaintiffs,

v.

LAW OFFICES OF SHAPIRO, BROWN, &
ALT, LLP, et al.,

Defendants.

Civil Action No. 3:12cv700

DECLARATION OF GEORGE BOYD

I, George Boyd, am above the age of 18 years, am of sound mind and body, and I hereby state, under penalty of perjury, as follows:

1. I am a resident of Henrico County, Virginia.
2. I am currently employed as an inventory analyst in Ashland, Virginia. My typical work hours are 7-4, Monday through Friday. Although I am able to take leave from work, it would be difficult for me to get enough time off of work to travel to the Norfolk Division in order to litigate my case.
3. The property that I owned and forms the basis for this lawsuit against the Defendants is located at 11000 Scattered Flock Court, Glen Allen, Virginia 23059, which is located in Henrico County and the Richmond Division of the Eastern District of Virginia.
4. If this case were to be transferred to the Norfolk Division, it would cause significant hardships and inconveniences for me. Not only is the Norfolk Division about two hours away from my home and job, but it would be difficult for me to take enough time off of work in order to travel to the Norfolk Division.
5. The federal courthouse in Richmond is only about twenty minutes from my home. It would be very easy for me to travel to the courthouse to offer my testimony during trial.
6. I also have a daughter who is nine years old and attends school in Henrico County. If I had to travel to the Norfolk Division in order to litigate this case, I would have to find someone in the area to watch her while I was traveling to and from Norfolk.
7. I also intend to call several witnesses located in the Richmond Division to support my case against the Defendants.

EXHIBIT

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Shumberg No. 5119

8. For example, I intend to offer the testimony of my wife, Paola Boyd. My wife knows about the material facts relevant to my foreclosure, including our attempts to obtain a modification, the communications that we received from the Defendants, and the damages that we suffered when we ultimately lost our home. My wife lives with me in Henrico County, Virginia. She works in Richmond, Virginia and it would be extremely difficult for her to take enough leave to travel to the Norfolk Division.

9. I will also seek to offer the testimony of employees from the Housing & Urban Development Office regarding my FHA mortgage loan in support of my claims. The only HUD office in Virginia is located in Richmond at 600 East Broad Street, Third Floor, Richmond, VA 23219-4920.


10. I also intend to seek the testimony of a Loan Processing Services representative. LPS has an office in the Richmond Division of the Eastern District of Virginia at 5640 Cox Road, Glen Allen, Virginia 23060.

11. Additionally, many of the documents pertaining to my foreclosure are located in the Richmond Division, including the land records pertaining to my foreclosure, which are located at the Henrico County Circuit Court.

12. It is my preference that my case be litigated in the Richmond Division, as it is far more convenient for me.

Under penalty of perjury under the laws of the United States of America, I hereby declare and affirm that the foregoing information is true and correct to the best of my information, knowledge and belief.

Dated: 1-25-13



GEORGE BOYD